

Case 3:14-cv-00159-MMD-VPC Document 81 (Ex Parte) Filed 01/02/15 Page 1 of 3

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 2 Washoe County District Attorney
 3
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FILED	RECEIVED
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COUNSEL/PARTIES OF RECORD	
JAN 07 2015	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY

6 ATTORNEYS FOR DEFENDANTS

7
UNITED STATES DISTRICT COURT
 8
DISTRICT OF NEVADA

9 * * *

10 ROBERT L. WILLIAMS,

11 Plaintiff, Case No. 3:14-CV-00159-MMD-VPC

12 vs.

13 WASHOE COUNTY JAIL, et al., EX PARTE MOTION FOR EXTENSION
 14
 15 Defendants. (Second Request)

16 Pursuant to Local Rules 6-1 and 6-2, defendants, Eric Gerow, Kevin Krush, Dennis
 17 Manor, Charles Evans, Michael Eubanks, Howard Huynh, and Jerry Cossio, (collectively
 18 referred to as "defendants") by and through counsel, make an ex parte motion for an extension of
 19 time to file a motion for summary in this action. The Washoe County defendants request that the
 20 time for filing be extended from the current due date of January 11, 2015 until February 13,
 21 2015.

22 This is the second request for an extension of time in this case. The first was a stipulation
 23 for extension of the discovery cutoff. (Dkt. 45). This request is made in good faith and not for the
 24 purpose of delay. There are several outstanding motions that may affect the scope of the motion

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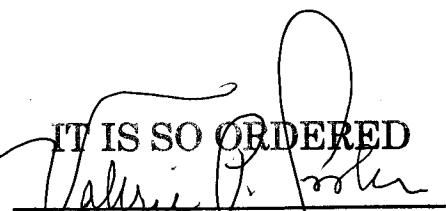
1 for summary judgment, including a motion to amend the complaint, motions to compel and a
2 motion to strike the IFP order. (Dkts. 57, 58, 70, 71, 73, 78). (Affidavit of Mary Kandaras).

3 Dated this 2nd day of January, 2015.

4 RICHARD A. GAMMICK
5 District Attorney

6 By /s/ Mary Kandaras
7 MARY KANDARAS
8 Deputy District Attorney
P.O. Box 11130
Reno, NV 89520-0027
9 (775) 337-5700

10 ATTORNEYS FOR DEFENDANTS

11
12
13 IT IS SO ORDERED
14 
15 U.S. MAGISTRATE JUDGE

16 DATED: January 6, 2015
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing in an envelope addressed to the following:

Robert L. Williams, #1118862
NNCC
P.O. Box 7000
Carson City, NV 89702

Dated 2nd day of January, 2015

/s/ C. Mendoza
C. Mendoza

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1 **AFFIDAVIT OF MARY KANDARAS**

2 STATE OF NEVADA

3 COUNTY OF WASHOE

4 I, Mary Kandaras, being first duly sworn and under penalty of perjury, do hereby depose
5 and say:

6 1. That I am a Washoe County Deputy District Attorney, and I am licensed to practice
7 law in the States of Nevada and California;

8 2. That I am assigned to the case of Robert L. Williams v. Washoe County Jail, et al.,
9 3:14-cv-00159-MMD-VPC;

10 3. I am requesting an extension of time to file a motion for summary judgment in this
11 action. The defendants request that the time for filing be extended from the current due date of
12 January 11, 2015 until February 13, 2015.

13 4. This is the second request for an extension of time in this case. The first was a
14 stipulation for extension of the discovery cutoff. (Dkt. 45). There are several outstanding motions
15 that may affect the scope of the motion for summary judgment. This includes a motion to amend
16 the complaint, motions to compel and a motion to strike the IFP order. (Dkts. 57, 58, 70, 71, 73,
17 78).

18 5. This request is made in good faith and not for the purpose of delay.

19 FURTHER YOUR AFFIANT SAYETH NOT.

20 
21 MARY KANDARAS

22 Subscribed and sworn to before me
23 this 2nd day of January, 2015 by
24 Mary Kandaras.

25 
26 Notary Public

